

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AL MAYA TRADING ESTABLISHMENT,

Petitioner,

Case No.: 14-CV-0275 (PAE)

-against-

GLOBAL EXPORT MARKETING, LTD.,

NOTICE OF MOTION TO DISMISS

Respondent.

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PLEASE TAKE NOTICE, that the above-captioned respondent Global Export marketing, Ltd., will move this Court before the Honorable Paul A. Engelmayer, United States District Judge, at a time and date to be fixed by the Court, to dismiss the Petitioner's motion pursuant to Federal Rule of Civil Procedure § 12(b)(6) on the ground that the motion fails to state a claim for who relief can be granted; for petitioner's failure to comply with Southern District of New York, Local Rule § 7.1; in the alternative, an order of the court that a trial by jury be held on the issue of the validity of the 1999 contract on which petitioner relies; and, that the Court orders sanctions against petitioner in accord with Fed. R. Civ. Pro. 11, and that the court grants such further relief as it deems appropriate.

Dated: New York, N.Y.
February 25, 2014

YOURS. Etc.,

/s/ Raymond J. Aab (RA 4195)
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